

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)
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This document relates to: *All Cases*

**DECLARATION OF ROBIN PRAMANAND**

I, Robin Pramanand, declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. I am the director of the IT department at the law firm Anderson Kill P.C. (“Anderson Kill”).

2. On the morning of July 15, 2021, I learned from Jerry S. Goldman, Esq. that Yahoo! News published an article authored by journalist Michael Isikoff, reporting that he had obtained a copy of a transcript of Mussaed al Jarrah’s (“Jarrah”) recent deposition in the September 11 litigation. See Michael Isikoff, FBI Tried to Flip Saudi Official in 9/11 Investigation, Yahoo! News, July 15, 2021.

3. In communications with Ms. Rybicki (the lead paralegal at the firm assigned to this matter and tasked with handling incoming deposition material) and Mr. Goldman, and in reviewing electronic documentation, I learned that on June 28, 2021, Ms. Rybicki received via email the final transcripts of the Jarrah deposition from the court reporter. In subsequent communications and investigations, I learned that on July 7, 2021, Ms. Rybicki received a link to the videos of the deposition from the court reporting company.

4. I was informed that at the time Ms. Rybicki received the transcripts, she was working on other time-sensitive projects, so she did not immediately file the transcripts in our electronic file system. Ms. Rybicki’s computer and email are password-protected and

secure and there is no evidence of any unauthorized access to her computer or email between June 28, 2021 and the present. Ms. Rybicki's computer is set, by default, to lock, upon a period of inactivity and cannot be accessed without the use of a password.

5. I was informed that from July 1, 2021 through July 6, 2021, Ms. Rybicki was out of the office on vacation. I was advised that Ms. Rybicki returned to work on July 7, 2021. That day, I understand that Ms. Rybicki received an email from the court reporter with a link to the videos of the Jarrah deposition. I understand that at the time Ms. Rybicki received the videos, she was working on other time-sensitive projects, so she did not immediately file the videos in our electronic file system.

6. On July 13, 2021, a few days after Ms. Rybicki returned from vacation, I was informed that she moved the transcripts and videos into a secure, shared folder on our electronic file system that the IT department created primarily for downloading confidential deposition materials from the September 11, 2001 litigation. This was corroborated by our electronic information. Only Ms. Rybicki, two (2) members of our IT department (myself and Mark Guercio),<sup>1</sup> Robert Horkovich, Esq., and Bruce Strong, Esq. have access to those documents.

7. At no time did I copy, print, forward, or otherwise provide electronic or hard copies of the Jarrah deposition transcripts to anyone within Anderson Kill or individuals outside the firm via email or other delivery methods.

8. On July 16, 2021, I reviewed, with Mr. Goldman, the file directory and confirmed that no one had accessed the Jarrah deposition transcripts since Ms. Rybicki moved them to the secure folder on July 13, 2021.

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<sup>1</sup> Mr. Guercio, Anderson Kill's system administrator, has 'back up' access to the secure folder, but has not used it.

9. On June 17 and 18, 2021, I understand that Emily Rybicki received by email from the court reporter rough transcripts of the deposition of Mussaed al Jarrah. Although I understand those are not an issue, I also have not copied, printed, forwarded, or otherwise provided electronic or hard copies of the rough transcripts to anyone within or outside of Anderson Kill.

10. I have never spoken to or contacted Michael Isikoff in any way about anything, including the Jarrah deposition or the transcripts. I was provided with certain email addresses of Mr. Isikoff in the course of this investigation and directed our IT department to verify if any emails were sent to him from Mr. Horkovich, Mr. Strong, Ms. Rybicki or Mr. Goldman. Our inquiry advised that there were no such emails in the Anderson Kill system.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed in Old Bridge, New Jersey on 7/30/21

*Robin Pramanand*  
Robin Pramanand